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COUNSEL/PARTIES OF RECORD	
MAR 26 2019	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
RENO DIVISION

ORDER

CAROLYN ANNETTE SALIN,
Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

No. 3:18-CV-00494-MMD-CBC

STIPULATION AND PROPOSED ORDER FOR
A FIRST THIRTY-DAY EXTENSION FOR
DEFENDANT TO FILE HER MOTION TO
AFFIRM AND RESPONSE TO PLAINTIFF'S
MOTION FOR REMAND

1 IT IS HEREBY STIPULATED, by and between Carolyn Annette Salin (Plaintiff) and
2 Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and through their
3 respective counsel of record, that Defendant shall have an extension of time of thirty (30) days to
4 file her motion to affirm and response to Plaintiff's motion for remand. The current due date is
5 March 27, 2019. The new due date will be April 26, 2019. This is Defendant's first request for
6 an extension. The parties further stipulate that all other dates will be extended accordingly.

7 Defendant requests this extension because the attorney responsible for briefing this case is
8 new to the office of the undersigned, requiring additional time for review by the undersigned
9 attorney, who remains counsel of record. Moreover, because a supervisor in Defendant's Office
10 of General Counsel is currently serving as a juror on a five-week trial, the undersigned attorney
11 for Defendant has assumed shared responsibility for overseeing the office's program litigation
12 workload throughout Nevada, California, Arizona, and Hawaii until approximately the second
13 week of April. Finally, the attorney responsible for briefing the case for Defendant is currently
14 out of the office on pre-scheduled annual leave, and has one additional district court brief in this
15 Court to finalize upon his return and a second brief in the Southern District of California to write.

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1 For all these reasons, Defendant requires an additional 30 days to prepare and file her
2 motion to affirm and response to Plaintiff's motion for remand. Plaintiff has no objection to this
3 request. This request is made in good faith with no intention to unduly delay the proceedings.

4 Respectfully submitted,

5 DATE: March 25, 2019

s/ Cyrus Safa
CYRUS SAFA
Attorney for Plaintiff
(by email authorization)

8 NICHOLAS A. TRUTANICH
9 United States Attorney

10 DATE: March 25, 2019

By s/ Daniel P. Talbert
DANIEL P. TALBERT
Special Assistant United States Attorney

12 Attorneys for Defendant

13 ORDER

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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17 DATED: 3/26/2019


THE HONORABLE CARLA BALDWIN CARRY
UNITED STATES MAGISTRATE JUDGE